

The Honorable Karen A. Overstreet
Chapter 11
[No Hearing Required]

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re
WEB PRESS CORPORATION,
Debtor.

Case No. 09-17418

**DEBTOR'S EX PARTE MOTION TO
EMPLOY ANDREW WILSON AS CHIEF
RESTRUCTURING OFFICER**

Pursuant to section 363(b) of the Bankruptcy Code, Web Press Corporation ("Web Press" or the "Debtor"), as debtor and debtor in possession, respectfully submits this Ex Parte Motion to Approve the Employment Agreement of Andrew Wilson as Chief Restructuring Officer (the "Motion"). In support of the Motion, the Debtor further represents the following:

1. On July 27, 2009 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor is operating its business as debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed. An Official Unsecured Creditors' Committee was appointed on August 14, 2009.

**EX PARTE MOTION TO EMPLOY
ANDREW WILSON AS CHIEF
RESTRUCTURING OFFICER - 1**

71696-0001/LEGAL18119275.1

Perkins Coie LLP
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1 2. This court has jurisdiction over this matter pursuant to 28 USC §§ 157 and
2 1334 and LR 2100-1. This Motion is a core proceeding pursuant to 28 USC § 157(b).
3 Venue is proper before this court pursuant to 28 USC §§ 1408 and 1409.
4

5 3. On April 15, 2010, the Debtor's two remaining officers, Mark Ricca and
6 Bernie Molinski, precipitously resigned, leaving literally no one in charge of operating the
7 Debtor. Only board member Richard Gaines and perhaps board member David Skaggs
8 remain. Mr. Ricca signed a power of attorney purportedly giving Mr. Gaines authority to
9 wind down the affairs of the Debtor. However, Mr. Gaines, through his corporation Pulaski
10 Web Corporation, is interested in making a bid on the assets and is thus conflicted from
11 taking any active role in the Debtor's management. Mr. Gaines also lives in Pulaski,
12 Tennessee. Therefore, the appointment of a responsible individual on an immediate basis to
13 take control and secure the Debtor's assets, and to run an efficient sale process, is critical to
14 preserve any value for the Debtor's estate.
15

16 4. Andrew Wilson of Lamonti Ventures, LLC is an experienced crisis manager
17 who has the ability to secured the Debtor's assets and manage the business on an interim
18 basis while engaging in a sales process. Mr. Wilson's relevant experience is summarized on
19 the attachment to his Declaration filed herewith. Mr. Wilson has no connections or conflict
20 of interest in this case.
21

22 5. For the foregoing reasons, the Debtor requests that the Court enter approving
23 Andrew Wilson's engagement as chief restructuring officer pursuant to the terms of the
24 engagement letter and proposed order filed herewith.
25

26 6. The undersigned has received approval from counsel for the Unsecured
27 Creditors' Committee and the United States Trustee to submission of this Motion and the
28 Order on an ex parte basis based on the exigent circumstances.
29

**EX PARTE MOTION TO EMPLOY
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1 WHEREFORE, the Debtor respectfully requests that the Court grant this Motion and
2 enter the form of proposed Order filed herewith.
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6

7 DATED: April 20, 2010.

PERKINS COIE LLP

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**EX PARTE MOTION TO EMPLOY
ANDREW WILSON AS CHIEF
RESTRUCTURING OFFICER - 3**
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